

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

| | | |
|---|---|--------------------------------|
| IN RE: | § | Chapter 11 |
| | § | |
| TEHUM CARE SERVICES, INC.,¹ | § | Case No. 23-90086 (CML) |
| | § | |
| | § | |
| DEBTOR. | § | |

PHILLIP BUCHANAN’S OBJECTION TO JOINT EMERGENCY MOTION FOR ENTRY OF AN ORDER (I) CONDITIONALLY APPROVING THE ADEQUACY OF THE DISCLOSURE STATEMENT, (II) APPROVING THE SOLICITATION AND NOTICE PROCEDURES WITH RESPECT TO CONFIRMATION OF THE JOINT CHAPTER 11 PLAN, (III) APPROVING THE FORMS OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, (IV) SCHEDULING CERTAIN DATES WITH RESPECT THERETO, AND (V) GRANTING RELATED RELIEF

Philip Buchanan, by and through undersigned counsel, submit this joinder in the Objection and relief requested filed by the US Trustee to the Joint Emergency Motion for Entry of an Order (I) Conditionally Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures With Respect to Confirmation of the Joint Chapter 11 Plan, (III) Approving the Forms of Ballots and Notices in Connection therewith, (IV) Scheduling Certain Dates With Respect Thereto, And (V) Granting Related Relief [Dkt No. 1022]. Mr. Buchanan also joins in the objection filed by William Kelly, Derico Thompson, and Kohchise Jackson [Dkt. No. 1027].

For all the reasons set forth in those Objections [Dkt Nos. 1022, 1027], Buchanan supports the relief requested in the Objections and hereby jointly requests that this Court deny

¹ 1 The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

approval of Debtor's Motion and the Disclosure Statement [Dkt. No. 986] and enter its Order granting such other and further relief it deems just and proper.

DATED this 16th Day of October, 2023.

Respectfully submitted,

Saint Louis University School of Law Legal Clinic,

/s/ Matt Vigil

Matt Vigil, MO Bar# 64215

Brendan Roediger MO Bar# 60585

Attorneys for Phillip Buchanan

100 N. Tucker Blvd., Ste 704

St. Louis, MO 63101-1911

314.977.2778

matt.vigil@slu.edu

Certificate of Service

I hereby certify that on 16th Day of October, 2023. I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matt Vigil